

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD LONG, a/k/a RONALD
CHAMBERLAIN,

Defendant.

Criminal Action No. 06-78

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Introduction

1. At all times relevant to this Indictment, Wachovia Bank and Citizens Bank were federally insured financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation or FDIC.

Scheme to Defraud

2. Beginning in or around November 2004, and continuing at least until in or around July, 2005, "B", an unindicted co-conspirator, supplied Ronald Long, a/k/a Ronald Chamberlain, the defendant, with counterfeit checks. "B" paid the defendant to negotiate the checks at various banks in and around Delaware.

3. The face of each counterfeit check showed that it was issued to an individual, the payee. So that the defendant could negotiate the checks, "B" supplied the defendant with identification, specifically, fraudulent driver's licenses bearing the names of the payees on the checks.



4. After receiving each counterfeit check and piece of identification, Ronald Long, a/k/a Ronald Chamberlain, the defendant, went to branches of Wachovia Bank and Citizens Bank, showed the fraudulent identification, and cashed, or attempted to cash, each check.

COUNT ONE

5. From on or about November 23, 2004, through on or about July 28, 2005, in the District of Delaware, Ronald Long, a/k/a Ronald Chamberlain, defendant herein, and "B", an unindicted co-conspirator known to the grand jury, did knowingly conspire with each other to execute and attempt to execute a scheme and artifice to defraud Wachovia Bank and Citizens Bank, federally insured financial institutions, as described more fully in paragraphs 1 through 4 above, incorporated herein by reference, in violation of 18 U.S.C. § 1344, and in execution of the fraud and in furtherance of the conspiracy, the defendant committed the following overt acts:

a. On or about November 23, 2004, the defendant, using identification in the name "W.C.", went to a Wachovia Bank branch and cashed a counterfeit check in the amount of \$3,850 drawn on the account of "Classic Settlements, Inc.";

b. On or about November 30, 2004, the defendant, using identification in the name "D.L.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$5,896 drawn on the account of "M.S.";

c. On or about December 3, 2004, the defendant, using identification in the name "V.F.", went to a Wachovia Bank branch and cashed a counterfeit check in the amount of \$3,850 drawn on the "Manassas TSS Trust Account";

d. On or about December 6, 2004, the defendant, using identification in the name "C.S.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$5,400 drawn on the "Howard M. Bushman Real Estate Escrow Account";

e. On or about December 7, 2004, the defendant, using identification in the name "J.S." went to a Wachovia Bank branch and cashed a counterfeit check in the amount of \$3,750 drawn on the "Howard M. Bushman Real Estate Escrow Account";

f. On or about December 8, 2004, the defendant, using identification in the name "N.C.", went to a Wachovia Bank branch and cashed a counterfeit check in the amount of \$3,750 drawn on the "Howard M. Bushman Real Estate Escrow Account";

g. On or about January 3, 2005, the defendant, using identification in the name "R.L.", went to a Wachovia Bank branch and cashed a counterfeit check in the amount of \$3,800 drawn on the "Lake Ridge TSS Trust Account";

h. On or about July 12, 2005, the defendant, using identification in the name "H.I.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$2,960 drawn on the account of "Main Street Settlements, Inc."; and

i. On or about July 13, 2005, the defendant, using identification in the name "I.C.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$2,970 drawn on the account of "Main Street Settlements, Inc."

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

6. From on or about November 23, 2004, through on or about July 28, 2005, in the

District of Delaware, Ronald Long, a/k/a Ronald Chamberlain, defendant herein, did knowingly execute and attempt to execute a scheme and artifice to defraud Wachovia Bank and Citizens Bank, federally insured financial institutions, in that the defendant, Ronald Long, a/k/a Ronald Chamberlain, was engaged in a scheme and artifice to defraud as described in paragraphs 1 through 5(i) above, incorporated herein by reference, and, in execution of the scheme the defendant negotiated counterfeit checks as described in paragraphs 5(a) through 5(i) above, incorporated herein by reference, all in violation of Title 18, United States Code, Section 1344.

COUNT THREE

7. From in or around November 2004, through in or around July 2005, in the State and District of Delaware, Ronald Long, a/k/a Ronald Chamberlain, defendant herein, did knowingly use, without lawful authority, means of identification of at least 11 persons during and in relation to a violation of the bank fraud statute, 18 U.S.C. § 1344, as described in paragraphs 1 through 6 above, incorporated herein by reference, all in violation of Title 18, United States Code, Section 1028A.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

BY:



Beth Moskow-Schnoll
Assistant United States Attorney

Dated: July 13, 2006